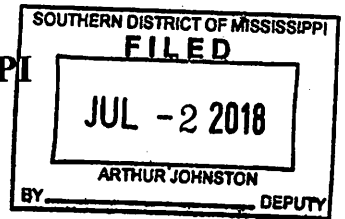


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**



DOUGLAS HANDSHOE

v.

CIVIL ACTION NO. 1:15cv382-HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A/ TROUT POINT
LODGE LTD OF NOVA SCOTIA & IN
THEIR INDIVIIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, & ASHOKA

**MEMORANDUM IN SUPPORT OF RESPONSE IN OPPOSITION TO
DEFENDANT LEARY'S MOTION TO EXTEND DEADLINE**

This Memorandum in Support of Response in Opposition to Mr. Leary's
Motion to Extend Deadline is respectfully submitted by Plaintiff Douglas
Handshoe.

This Court previously struck Mr. Leary's prior Summary Judgment Motions
since they were signed and submitted by Mr. Leary's business partner in New
Orleans Louisiana.¹ Further, Mr. Leary failed to sign those documents and adopt
them as his own after being put on notice of the deficiency. Mr. Leary's own
dilatory conduct in this matter precipitated his missing the dispositive motion
deadline and the Court should not reward Mr. Leary's dilatory conduct by
extending a deadline that expired over 90 days ago.

¹ See Opinion and Order at ECF Number 222

Additionally, Mr. Leary's Motion does not comply with local rules and it should be disregarded.

Conclusion

Plaintiff respectfully requests this Court denies Mr. Leary's Motion to Extend Deadlines.

Respectfully submitted this 29th day of June, 2018,



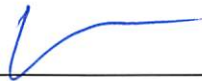
Plaintiff
Douglas Handshoe
Post Office Box 788
110 Hall Street
Wiggins, MS 39577
(601) 928-5380
earning04@gmail.com

CERTIFICATE OF SERVICE

I, Douglas Handshoe, hereby certify that on June 29, 2018 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

I, Douglas Handshoe, hereby certify that on June 29, 2018, I mailed the foregoing to Charles Leary at 308 5th Ave E, Vancouver, BC V5T 1H4 Canada.

Respectfully submitted this 29th day of June, 2018,



Douglas Handshoe
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